IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

NETWORK, INC., et al.,)
Plaintiffs,)
v.) Civil Action No. 8:20-cv-02042-TDC
UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,))
Defendants.)))

JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

- 1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS ("Request 1"), State ("Request 2"), and DHS ("Request 3") respectively. (Compl. ¶¶ 27-40.)
- 2. On April 12, 2021, USCIS produced its sixth rolling release of documents comprised of 41 pages and 361 partially produced pages from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS is presently processing the seventh production of USCIS pages. Subject to FOIA exemptions, the seventh production of

USCIS pages is expected to be produced on or about May 6, 2021. Per the request of Plaintiffs, the seventh production will consist of responsive, non-FOIA exempt documents from OP&S.

- 3. On March 17, 2021, State unintentionally re-produced its third rolling release that had previously been produced on February 17, 2021. State subsequently identified this error and produced its fourth rolling release on April 9, 2021 comprised of 1 record released in full and 57 records released in part. State is continuing to collect unclassified potentially responsive documents. The fifth production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before April 17, 2021. While searches for records on classified systems continue to be inhibited by the ongoing impact of COVID-19 mitigation measures on staffing, State will initiate searches of classified systems promptly upon the relevant employees re-obtaining access to those systems.
- 4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: April 15, 2021 Respectfully submitted,

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